Ryan White
Part A/MAI Program
OVERVIEW OF THE
NEW SITE VISIT
MONITORING INSTRUMENT

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Compliance Officer
What is our objective?

- To familiarize ourselves with the County, State, and Federal statutes and regulations governing the Ryan White Contract.

- To go over the Monitoring Instrument and identify “What’s new” in the 2016.

- To review the site visit process and discuss how to prepare for pre and post site visit activities.
Site Visits

- Annual requirement of funder HRSA/HAB
- Measures National Monitoring Standards instituted in 2011 and updated in 2013
  - Universal
  - Fiscal
  - Admin
- Also measures compliance to Miami Dade County Contract
- New Sections related to the Uniform Guidance
- Monitoring tool posted on miamidade.gov website
What is the Uniform Guidance?

- The Federal Office of Management and Budget's (OMB) officially implemented the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (commonly called "Uniform Guidance") was in December 2014 by the Council on Financial Assistance Reform (COFAR).
- Supersede requirements from:
- Contain Special Requirements for Purchasing and Procurement
- HRSA has further codified the Uniform Guidance into Federal Register 45 CFR Part 75 located at www.ecrf.gov.
Site Visit Program - Timeline

- Notification of upcoming site visits sent with checklist.
- Providers should review the instrument and call with questions.
- Letter with dates and times of your site visit sent no more than 5 days in advance.
- 12-18 hour notification of half of CIS #s.
Site Visit Requirements

- Estimated time – 2-5 days on site
- Space accommodations
  - Room available with computer(s), if files are electronic
- Selected personnel records available
- Agency staff available to assist Site Visit Team
- Access to documents (electronic or hard copy)
Site Visit Overview

- Entrance Interview
- Program will be given the second half of the CIS #s
- Fiscal and HR will be given selected months and personnel for review
- Compliance Officer will meet with fiscal, program, and administrative staff to conduct Sections 4, 7 through 20
- OMB Contract Officer will conduct Sections 5 (Billing Practices) and Section 6 (Client Eligibility)
- For larger providers, OMB Fiscal Officers will also attend

Exit Interview
Site Visit Program - Checklist

- Checklist sent with 90-day notification letter
- Provider sends electronic documents by deadline
- OMB-GC/RW performs preliminary reviews in office
- Collect remaining documents during site-visit
- Minimizes time on-site

10/31/2016

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Review of Documents

- Minimum Review of:
  - Accounting systems
  - Income and Expense Reports
  - Written Financial Policies and Procedures
    - Billing, collection, purchasing, and procurement
  - Accounts Payable and Receivable systems and policies
  - Spreadsheets/cost tracking mechanisms
  - Payroll records – including Time & Effort documentation
  - Hard-copy expenditure data
  - Payroll records
  - Billing records
  - Client Satisfaction
  - Filing system (security)
  - Petty Cash records, procedures, and disbursements
  - Internal controls for segregation of duties
  - Allowable and unallowable costs
  - Payer of last resort
  - Third party billing
  - Personnel Policies
  - Single Audit
  - And any other documents as related to Ryan White program

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Review of 2016 Comprehensive Monitoring Instrument

- Section I: Subrecipient Information
- Section II: Contract Information
- Section III: Logistics of Monitoring Visit
- Section IV: Building Maintenance, Accessibility, and Risk Management
- Section V: Billing Practices
- Section VI: Client Eligibility
- Section VII: Operating Policies
- Client Participation in Subrecipient’s Operations
- Section IX: Board of Directors’ Activities
- Section X: Culturally and Linguistically Appropriate Service Standards
- Section XI: Personnel Policies and Procedures
- Section XII: Fiscal Management
- Section XIII: Payroll Records
- Section XIV: Payroll Tax Records and Payment of Fringe Benefits
- Section XV: Protection of Records
- Section XVI: Protection of Property
- Section XVII: Subcontracts Related to the Provision of Ryan White Program-Funded Services
- Section XVIII: Licenses and Accreditations
- Section XIX: Insurance Coverage
- Section XX: Program Reporting
- Section XXI: Quality Management and Continuous Quality Improvement

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Post Site Visit Deliverables

- Site Visit Report – Delivered 6-8 weeks following visit
- Corrective Action Report, if necessary - Agency due 30 days upon receipt of Site Visit Report
- Compliance with Findings: 30-60 days after receipt of Site Visit Report. Reimbursements due 30 days after Report

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Questions?
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